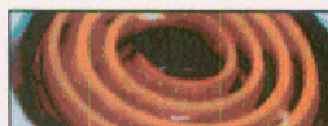


EXHIBIT 1

Content From WTDR-FM
Website (Color and Black and White)



TO SOME, THIS IS A PLACE TO
COOK MACARONI AND CHEESE.



[Club Thunder](#)

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[Thunder Talker](#)

[Thunder Air Staff](#)

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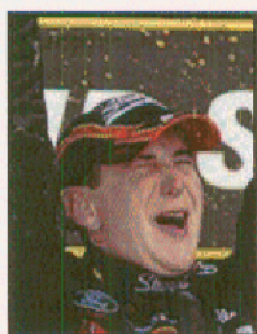
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[2004 Truck Schedule](#)
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[04 Busch Race Results](#)

THUNDER TODAY



Kurt Busch Wins Third Straight At Bristol!

Kurt Busch went the last 60 miles without pitting Sunday at Bristol -- and the gamble paid off. Busch won the Food City 500 for his third straight win at the bullring in northeast Tennessee. Rusty Wallace finished a painful second after leading 100 laps while Kevin Harvick enjoyed his best finish of 2004 coming home third.

ON AIR

The Cou
Crew

5am - 9am



[View Deta](#)

THIS PA
SPONSO

HEADLINES

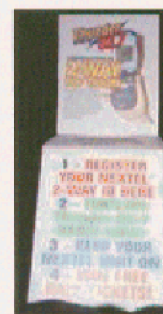


Junior's Boy Delivers At Bristol - Truex Jr. Gets First NASCAR BGN Win.

Even for Bristol, the ending of Saturday's Sharpie Professional 250 was wild. When the smoke cleared, Martin Truex Jr. took his first career Busch Series checkered flag. Meanwhile, chaos reigned behind him.

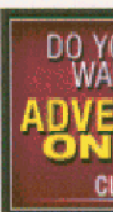
Communications, Inc. 2-WAY FOR TICKETS Begins This Friday - Register Your NEXTEL 2-WAY ID # Now To Win!

Local authorized Nextel dealer, Communications, Inc. teams with Thunder 92-7 to give listeners the opportunity to register their Nextel 2-way ID# for chances to win tickets to race day activities during Aaron's Dream Weekend at Talladega next month.



Get Your Tickets Now For AIDB "RACE FEVER NIGHT"

Don't miss your chance to rub elbows with NASCAR drivers and other celebrities at the 19th





Annual RACE FEVER NIGHT on Friday, April 23rd at the Speed Channel Dome, benefiting the children of AIDB. WTDR's Producer Jim & Lisa Carr will be there broadcasting live immediately following Bud Pole Qualifying coverage on MRN Radio.

Thunder 92-7 News Headlines for FRIDAY MARCH 26, 2004



Calhoun County commissioners trying to make the county more environmentally friendly...Honda announces a major rail system to transport its vehicles...A Talladega County woman dies in a traffic crash...br>FOR DETAILS ON ALL THE DAYS HEADLINES CLICK THE ABOVE LINK...

****IF YOU HAVE A NEWS TIP, CALL THE NEWSROOM DIRECTLY AT 256-741-6088 OR YAHOO MESSENGER: thunder927news OR EMAIL: NEWS@THUNDER927.COM*****

PEOPLE POLL

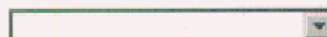
Battle of Brains or A Battle of Something Else?

We have a long way to go until the election. Keeping in mind this Poll is unscientific and just for fun, it is interesting how people from all over the country view the process.

**What is your view of
"Negative Campaigning" as
opposed to keeping
Focussed on the issues at
hand?**

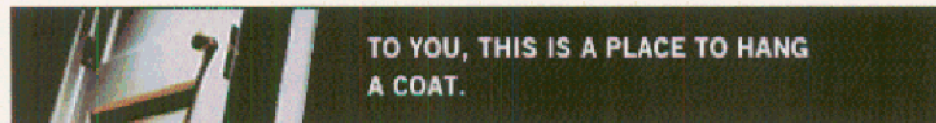
- ☐ I want to hear candidates stay with issues only.
- ☐ I want to hear both positives and negatives.
- ☐ It's like the weather, I can complain but to no avail.
- ☐ I want to hear ALL the dirt on EVERYBODY!
- ☐ I refuse to watch Campaign Television, period!

[View Results](#)





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Advertise With Us!

Thunder 92-7, WTDR is committed to providing our customers the most proven and successful marketing strategies available. Our ultimate goal is to create the best possible return-on-investment for your advertising dollar within our marketplace.

At this station, we sell to sell again! That means giving customers the marketing ideas and execution to generate results

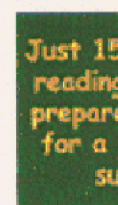
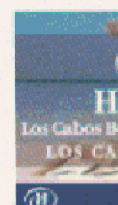
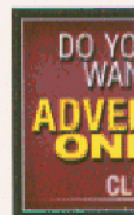
WTDR-FM's large, loyal adult audience permits you to target customers that are most likely to do business with you, making advertising more cost-effective and providing you with the ability to actually "measure" your results.



This section of our website is designed to give you true "on-line" access to any information you might need to make an informed radio buying decision in the Anniston/Oxford/Talladega, Alabama marketplace. It also contains various pages of information specifically about WTDR-FM, Thunder 92-7.

Please browse our site, and then contact us so we can begin discussing your business goals and all the ways WTDR-FM can drive our listeners to your business.

THIS PA
SPONSO



Why Use Radio To Reach Your Customers?

Radio reaches EVERYBODY! Almost 99% of adults over the age of 30 listen to radio every day...and they listen a lot! Over three hours each day. Click this link to see more information on why radio is the hot ticket to reach your customers.

Current Packages & Specials

Throughout the year, we post special "package" programs available. Click this link to see what's in the menu right now.

WTDR Media Kit

This is where you'll find everything you need to know about WTDR-FM including coverage area, rates, Arbitron listening data and much more.

Advertisers

See what our current customers have to say about their successes using Thunder 92-7!

Get A Rate Quote

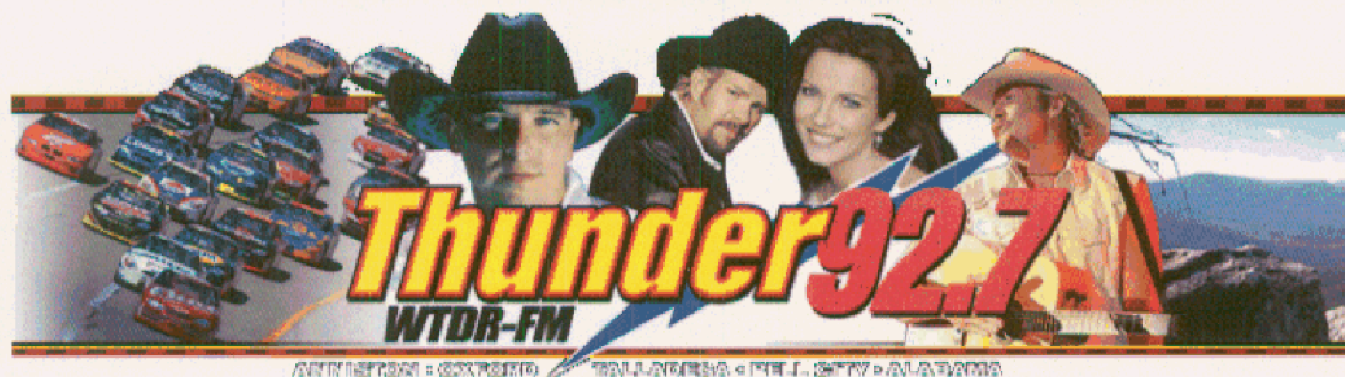
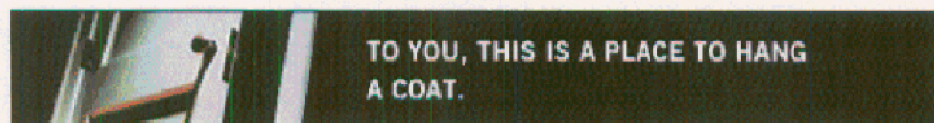
Click here to get the rates you need to plan an upcoming campaign, or to discover how affordable doing business with this area's most listened-to radio station can be.

[Tell a Friend](#)



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Ads by Go
Nascar ti
Talladega
Great sele
prices to a
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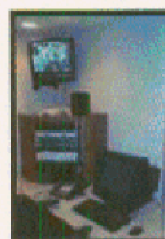
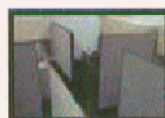

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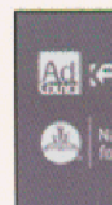
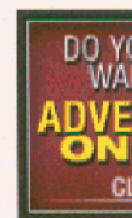
Thunder Picture Book

THE LATEST PICS! WTDR Oxford Offices & Studios

It started in late April, just after race weekend, and now, we're beginning to see the light at the end of the tunnel (and it ain't no train). We're already operating our advertising sales department from our new offices at 1913 Barry Street, Suite B in Oxford, just down from Outback Steakhouse near the I-20 Overpass. Broadcast operations should begin from the new facilities by the end of August. Keep your fingers crossed for us! We can't wait.



THIS PAGE
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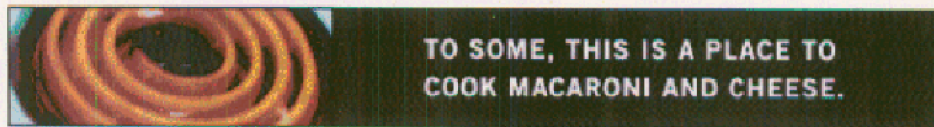
Page: 1 2 3 4 Next

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Contact Us

Thanks for visiting Thunder 92-7 On Line. We have provided many easy ways for you to reach our facilities.

BY TELEPHONE:

BUSINESS OFFICES

Oxford or Talladega Office - (256)-741-6000

These lines use automated attendants.

STUDIOS (Talk To A Real DJ)

Studio/Contest Toll-Free - 1-800-709-9270

Oxford Direct - (256)-831-9288

FAX

Oxford - (256)-741-6080

Talladega - (256)-315-5900

BY MAIL:

Corporate Offices:

WTDR-FM

P. O. Drawer 329

Talladega, Alabama 35161

Oxford Offices:

WTDR-FM

1913 Barry Street

Suite B

Oxford, Alabama 36203

We would love to hear your feedback about our station and website, good or bad. It's important for us to know what you believe are steps we can take to make the station and on-line site better. Pick the management person who you need to send a question or suggestion to from the pull-down menu below and drop us a line! We promise you'll hear back from us promptly. Thanks for visiting our site and listening to WTDR-FM, Thunder 92-7. We appreciate it very much!

To:

General Manager

Your Name:

Your E-Mail Address:

City you live in:

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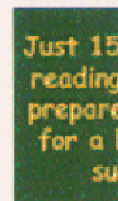
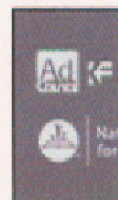
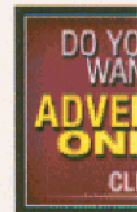


Exhibit 2

Sampling of E-mail Complaints Regarding WTDR-FM
Reception In Anniston Urbanized Area

Subj: **WTDR Signal**
Date: 1/20/2004 10:52:53 AM Eastern Standard Time
From: jimj@thunder927.com
To: Tepperlaw@aol.com
Sent from the Internet (Details)

Cary:

Another in support of the Anniston and Eulaton translator

Jim Jacobs
President-General Manager
Jacobs Broadcast Group, Inc.
WTDR-FM Thunder 92.7
Phone 256-741-6000 ext. 230
Fax 256-741-6031
online www.thunder927.com/

-----Original Message-----

From: Susan Durham [mailto:sdurham@calhoun.k12.al.us]
Sent: Tuesday, January 20, 2004 7:27 AM
To: 'jimj@thunder927.com'
Subject:

I live in the Oxford area but work in the Saks area.
I have always had a radio in my office and listened to the
local station when possible. I cannot pick up Thunder 92.7
on the radio in my office so I listen to a Birmingham station.
I would listen to Thunder if I could pick it up.

Also, on my way to work, your signal usually fads out as
I pass under the red light at Blue Mountain Road and
McClellan Boulevard and a Birmingham station fads in.

Susan Durham
4400 McClellan Blvd
Anniston, AL 36206

Home: 7 Anderson Place
Oxford, AL 36203

-----Original Message-----

From: SHEILA CLARK [mailto:SHEILAJ@ALSPI.COM]

Sent: Monday, January 19, 2004 7:53 AM

To: jimj@thunder927.com

Subject: FW: bad reception

understand you need this information

Sheila Clark
1111 Chatwood Dr
Anniston, AL 36206
256-820-3987

-----Original Message-----

From: SHEILA CLARK [mailto:SHEILAJ@ALSPI.COM]

Sent: Monday, January 19, 2004 7:45 AM

To: 'jimj@thunder927.com'

Subject: bad reception

Producer Jim - We live in saks and cannot get a clear signal. And on the way home from Munford everyday, I lose your signal when I hit Bynum Leatherwood Rd (Welborn). Glad to hear that ya'll want to up the signal. Hope this helps.

-----Original Message-----

From: Bryant [mailto:bmathis@cybrtyme.com]
Sent: Monday, January 19, 2004 4:42 PM
To: jimj@thunder927.com
Subject: Re: Feedback

Bryant Mathis, 219 Patricia Road, Anniston, AL 36206 hm phone 237-6187

> Subject: Feedback

>

>

>

> Name: Bryant Mathis

>

> E-mail Address: bmathis@cybrtyme.com

>

> City: Anniston

>

> Comments:

>

> We live in the "Saks" area (near the schools) and get poor reception in
the

> early morning and at different times throughout the day. Thank you

>

Bad Reception

Page 1 of 1

Subj: **FW: Bad Reception**
Date: 1/20/2004 8:06:28 AM Eastern Standard Time
From: jimj@thunder927.com
To: Tepperlaw@aol.com
Sent from the Internet (Details)

This is good for the Anniston and Eulaton translators.

Jim Jacobs**President-General Manager**

Jacobs Broadcast Group, Inc.
WTDR-FM Thunder 92-7
Phone 256-741-6000 ext. 230
Fax 256-741-6031
online www.thunder927.com/

-----Original Message-----

From: Buchanan, Carol (PKI) [<mailto:carol.buchanan@us.army.mil>]
Sent: Tuesday, January 20, 2004 5:28 AM
To: 'JimJ@thunder927.com'
Subject: Bad Reception

Jim,

I work at Anniston Army Depot and have trouble getting Thunder 927 to come in clearly. There is a lot of static. I do work in the office of a very large metal building with a lot of electronic and automated (robots) equipment. There are wires to guide the robots located in the floor of the shop. When I look out my window in the office I am looking at a mountain and this may have a lot to do with it also. Also, driving west on highway 202 out of Anniston toward the Depot there are some dead spots. When I can't get good reception with you I just put on a CD - I don't listen to any other radio station!!!!

I sure hope you can get the FCC to let you upgrade so I can listen for a long time.

Thanks and keep up the good work.

Carol Buchanan
1764 Airport Road
Oxford, AL 36203

256-831-1681

Subj: **FW: signal static**
Date: 1/20/2004 8:05:09 AM Eastern Standard Time
From: jimj@thunder927.com
To: Tepperlaw@aol.com
Sent from the Internet (Details)

Cary:

Another comment good for the Anniston translator.

Jim Jacobs
President-General Manager
Jacobs Broadcast Group, Inc.
WTDR-FM Thunder 92-7
Phone 256-741-6000 ext. 230
Fax 256-741-6031
online www.thunder927.com/

-----Original Message-----

From: Janice Graham [mailto:rphjan@mac.com]
Sent: Monday, January 19, 2004 11:16 PM
To: jimj@thunder927.com
Subject: signal static

From:
Janice Graham
6109 Shannon Brook Lane
Oxford AL 36203
256-835-6650

I live in the Oxford area and pick up your signal great, but I work in Alexandria. When I drive north to Hwy 431 I almost completely lose your signal. You are my favorite radio station. I prefer listening to a local station rather than B'ham or Atlanta.

Sincerely
Janice Graham
rphjan@mac.com

Subj: **FW: Bad Coverage Areas**
Date: 1/19/2004 2:01:05 PM Eastern Standard Time
From: jimj@thunder927.com
To: Tepperlaw@aol.com
Sent from the Internet ([Details](#))

Another listener email that will support the Eulaton translator.

Jim Jacobs

President-General Manager

Jacobs Broadcast Group, Inc.

WTDR-FM Thunder 92.7

Phone 256-741-6000 ext. 230

Fax 256-741-6031

online www.thunder927.com/

-----Original Message-----

From: Mhaynes35@aol.com [mailto:MHaynes35@aol.com]

Sent: Monday, January 19, 2004 12:47 PM

To: jimj@thunder927.com

Subject: Bad Coverage Areas

I experience loss of reception in the north Anniston area. I is worse in Saks, Weaver, Lenlock, and surrounding areas. Anything that can be done to improve coverage in these areas will be greatly appreciated by the listeners of WTDR Thunder 92.7. Thanks,

Mark Haynes
72 Gate 8 Rd.
Anniston, AL 36201
(256)236-0917

Subj: **FW: reception**
Date: 1/19/2004 12:50:28 PM Eastern Standard Time
From: jimj@thunder927.com
To: Tepperlaw@aol.com
Sent from the Internet (Details)

Here's another one from Oxford.

Jim Jacobs
President-General Manager
Jacobs Broadcast Group, Inc.
WTDR-FM Thunder 92-7
Phone 256-741-6000 ext. 230
Fax 256-741-6031
online www.thunder927.com/

-----Original Message-----

From: Moore Printing [<mailto:mooreprnt@earthlink.net>]
Sent: Monday, January 19, 2004 11:18 AM
To: jimj@thunder927.com
Subject: reception

I live in Oxford and my husband and I wake up to 92.7 every morning. Our reception isn't great there, but I work at Moore Printing Co. in Anniston and I really have a hard time here. I have rabbit ears hooked up to my radio by my desk and have to constantly adjust them throughout the day. In the car, we have noticed we have dead spots in several areas that we go frequently. I would love to have better reception! It would make my day alot less stressful!!

Thank You,

Vicky Rich

233 Pace Street
Oxford, AL 36203
310-0575

Subj: **FW: more power**
Date: 1/19/2004 10:17:46 AM Eastern Standard Time
From: jimj@thunder927.com
To: Tepperlaw@aol.com
Sent from the Internet (Details)

Cary:

This email is supportive of our Oxford translator. The reference is to Hwy 78 East in East Oxford. According to projected contour maps, this listener should be within a mile of our city-grade signal, but still has to go to these extremes to pick us up.

Please note that Jacksonville is well outside our 60 dbu contour and shouldn't be referenced in any of the statements.

Jim Jacobs

President-General Manager

Jacobs Broadcast Group, Inc.
WTDR-FM Thunder 92-7
Phone 256-741-6000 ext. 230
Fax 256-741-6031
online www.thunder927.com/

-----Original Message-----

From: Bosjigs@aol.com [<mailto:Bosjigs@aol.com>]
Sent: Monday, January 19, 2004 7:59 AM
To: jimj@thunder927.com
Subject: more power

Good morning, I live in Jacksonville and your signal comes in and out and on the way to work on 21 south it is real bad. I work on hwy 78 at Kirkpatrick Concrete, it is on the left just before you get to Sunny King Honda new car lot if you are headed east. I have copper wire wrapped around my radio antenna and run along the top of office rying to receive your signal. It works ok but, it could be better. Thank for the good station.

256-831-6663
Randy Bobo

Subj: **FW: Fix that tower Jim!**
Date: 1/19/2004 10:15:12 AM Eastern Standard Time
From: jimj@thunder927.com
To: Tepperlaw@aol.com
Sent from the Internet (Details)

Another listener statement. This is yet another testament to us losing our signal through downtown Anniston. I'll forward the statement with signature under *separate email*.

Jim Jacobs

President-General Manager

Jacobs Broadcast Group, Inc.
WTDR-FM Thunder 92.7
Phone 256-741-6000 ext. 230
Fax 256-741-6031
online www.thunder927.com/

-----Original Message-----

From: Cooter0519@aol.com [mailto:Cooter0519@aol.com]
Sent: Monday, January 19, 2004 8:09 AM
To: jimj@thunder927.com
Subject: Fix that tower Jim!

Jim,

I doubt you remember me, but I used to race R/C in the days of 'way back when'. We were the 1/12 scale guys.

Anyway, I am glad to hear that you are trying to get your signal area over Oxford/Anniston and Weaver fixed. I drive from Oxford to Weaver Elementary School and the signal gets lost on Quintard Avenue when I start down the hill past the Anniston K-Mart near the 21/431 interchange at the Museum and Board Office.

You guys do a great job and I appreciate your views on many of today's issues...except Jeff Gordon :)

Thanks!

Greg Gaines
3006 Friendship Rd
Oxford AL 36203
(256) 832-0272

WTDRList

Reply-To: "Nancy Hanck" <nancyhanck@bellsouth.net>
From: <nancyhanck@bellsouth.net>
To: <jimj@thunder927.com>
Subject: Feedback
Date: Sat, 17 Jan 2004 17:34:01 -0600
Message-ID: <SATURDAYUor03u9PH3I000007ac@satursday.fimc.net>
MIME-Version: 1.0
Content-Type: text/plain;
charset="iso-8859-1"
Content-Transfer-Encoding: 7bit
X-Priority: 3 (Normal)
X-MSMail-Priority: Normal
X-Mailer: Microsoft Outlook IMO, Build 9.0.2416 (9.0.2910.0)
X-RCPT-TO: <jimj@thunder927.com>
X-UIDL: 369106546
X-MimeOLE: Produced By Microsoft MimeOLE V5.00.2615.200
X-OriginalArrivalTime: 17 Jan 2004 23:34:01.0251 (UTC) FILETIME=[62E18730:01C3DD52]
Importance: Normal

Originated from:

Name: Nancy Hanck

E-mail Address: nancyhanck@bellsouth.net

City: weaver

Comments:

Jim

I have problems coming to work and going home and at home listening to yall.
I love to listen to you, but when you get to kmart your station goes in and
out.

Nancy Hanck
718 Timberway
Weaver, Alabama 36277
256-820-1098

By the way we cant get your station at work either. I work at East Alabama
Regional Planning and Development Commission in the Quintard Towers right
across from the Anniston Post Office. I would like to listen to you but we
cant get it.

Thank You
Nancy Hanck

file000

From: "Reid and Karon Simmons" <rdksimm2@bellsouth.net>
To: <jimj@thunder927.com>
Cc: <jimj@thunder927.com>
Subject: station
Date: Sat, 17 Jan 2004 12:22:52 -0600
Message-ID: <000901c3dd26\$fd2286e0\$3ae53cd0@rdksimm22>
MIME-Version: 1.0
Content-Type: multipart/alternative;
boundary="-----=_NextPart_000_000E_01C3DD37.793EBB80"
X-Priority: 3 (Normal)
X-MSMail-Priority: Normal
X-Mailer: Microsoft Outlook Express 6.00.2800.1158
X-RCPT-TO: <jimj@thunder927.com>
X-UIDL: 369106543
X-MimeOLE: Produced By Microsoft MimeOLE V5.00.2615.200
Importance: Normal

This is a multi-part message in MIME format.

-----=_NextPart_000_000E_01C3DD37.793EBB80
Content-Type: text/plain;
charset="iso-8859-1"
Content-Transfer-Encoding: 7bit

We listen to thunder 92.7 all the time, it is our favorite station. We live in norther Calhoun County where the reception is not real great. I drive through Alexandria, Saks and Jacksonville all the time and have problems picking up the station. I can't pick up the station at my home at all. Do something to help, your station is great.

Karon and Reid Simmons
434 Old Ann-Gad Hwy
Ohatchee, AL 36271
256-892-0887

Thanks

-----Original Message-----

From: aleahspcreations@cs.com [mailto:aleahspcreations@cs.com]

Sent: Monday, March 10, 2003 2:09 PM

To: jimj@thunder927.com

Subject: Feedback

Originated from: <http://www.thunder927.com/contactus.asp>

Name: aleah mcwhorter

E-mail Address: aleahspcreations@cs.com

City: oxford

Comments:

i was wondering if there is anyway that i could listen to Thunder 92.7 through my computer speakers at work? I didn't know if i could log on somehow? My radio will not pick up your station in the building that i work in. Thanks a lot for your help! aleah

2026 Peek Drive
Oxford, AL 36203

(256) 831-3825

WTDRInte
Reply-To: "Sharon Thomas" <bknfyn@aol.com>
From: <bknfyn@aol.com>
To: <jimj@thunder927.com>
Subject: Feedback
Date: Thu, 15 Jan 2004 08:35:01 -0600
Message-ID: <SATURDAY27kBnccYTjr0000048a@saturday.fimc.net>
MIME-Version: 1.0
Content-Type: text/plain;
charset="iso-8859-1"
Content-Transfer-Encoding: 7bit
X-Priority: 3 (Normal)
X-MSMail-Priority: Normal
X-Mailer: Microsoft Outlook CWS, Build 9.0.2416 (9.0.2910.0)
Importance: Normal
X-MimeOLE: Produced By Microsoft MimeOLE V6.00.2800.1165
X-OriginalArrivalTime: 15 Jan 2004 14:35:01.0954 (UTC) FILETIME=[C254EA20:01C3DB74]
X-RCPT-TO: <jimj@thunder927.com>
X-UIDL: 369106490

Originated from: <http://www.thunder927.com/contactus.asp>

Name: Sharon Thomas

E-mail Address: bknfyn@aol.com

City: Anniston

Comments:

I would really enjoy listening to your station while I work, but can't pick up your signal!!!!!!

-----Original Message-----

From: greenebl@hotmail.com [mailto:greenebl@hotmail.com]

Sent: Friday, May 02, 2003 8:53 AM

To: jimj@thunder927.com

Subject: Feedback

Originated from: <http://www.thunder927.com/contactus.asp>

Name: Bonnie Greene

E-mail Address: greenebl@hotmail.com

City: Anniston

Comments:

I enjoy listening to your radio station and look forward to better reception when you make you move to Oxford. I work in Oxford and we apparently are in a bad area as the reception is lousy as it fades amd eventually lose you all together. When are you moving to your Oxford location and where will it be located? I hope it is real soon. Keep up the good broadcasting but increase the power. On my way home I start losing reception again at Blue Mountain (K-Mart) area and really would enjoy l,istening to you more if things inproved. Thanks for listening to me.
Bonnie G.

JOHN J. MULLANEY
JOHN H. MULLANEY, P.E. (1994)
ALAN E. GEARING, P.E.
TIMOTHY Z. SAWYER

301 921-0115 Voice
301 590-9757 Fax

Mullaney@MullEngr.com

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE:

**COMMENTS IN OPPOSITION
MB DOCKET 04-19
FM TABLE OF ALLOTMENTS
TALLADEGA AND MUNFORD, ALABAMA**

MARCH 29, 2004

**ENGINEERING STATEMENT IN SUPPORT OF
COMMENTS IN OPPOSITION**

**Prepared On Behalf Of
Calhoun Communications**

ENGINEERING EXHIBIT EE:

**COMMENTS IN OPPOSITION
MB DOCKET 04-19
FM TABLE OF ALLOTMENTS
TALLADEGA AND MUNFORD, ALABAMA**

TABLE OF CONTENTS:

1. Declaration of Engineer
2. Narrative Statement
3. Figure 1, FM Channel Study - 224A - WTDR-Lic.
4. Figure 2, Allowable Area Map - 224A.
5. Figure 3, Potential Service to Anniston, AL.

Declaration

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested by Calhoun Communication, to prepare the instant engineering exhibit in support of comments in opposition to the proposed modification of the FM table of Allotments.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

/s/ John J. Mullaney
John J. Mullaney, Consulting Engineer

Executed on the 29th day of March 2004.

ENGINEERING EXHIBIT EE:

**COMMENTS IN OPPOSITION
MB DOCKET 04-19
FM TABLE OF ALLOTMENTS
TALLADEGA AND MUNFORD, ALABAMA**

NARRATIVE STATEMENT:

I. General:

This engineering statement has been prepared on behalf of Calhoun Communication.

The purpose of this statement is to provide engineering support in opposition to the proposed modification of the FM table of allotments in MB Docket 04-19 - re-allotment of Ch. 224A from Talladega to Munford, Alabama.

The NPRM proposes to reallocate Ch. 224A from Talladega to Munford, Alabama. However, the NPRM ***fails to indicate*** that no properly spaced allotment reference point exists which will permit the allotment of Ch 224A to Munford. To the contrary the NPRM in paragraph 5 states that:

“ 5. Consistent with the technical requirements of the Commission’s Rules, Channel 224A can be allotted to Munford, Alabama, utilizing coordinates of 33-29-12 NL and 85-59-15 WL, with a site restriction of 5.9 kilometers (3.6 miles) southwest of Munford.”

II. Engineering Discussion:

A. Compliance with Section 73.207 - Required Separations:

Figure 1 is a channel study which utilizes the licensed site (also NPRM site) of WTDR on Ch. 224A at Talladega. This figure indicates that the current site is **short spaced by 9.86 km** to WAFN on Ch. 221A at Arab, AL. With respect to WAFN the map in the upper portion of the figure shows the required separation for both 6 kW (114.5 km) and for 3 kW (104.5 km) operation. When originally allotted, Ch. 224A at Talladega only had to comply with the **old 3 kW rules**.

B. Compliance with Section 73.203 - Allotment City Grade Service:

Figure 2 is an allowable area map depicting the required separations to relevant stations. This figure shows that there is an area some 9 to 14 km south-southwest of the city of Talladega which **fully complies** with the required separations for **6 kW operation**. A Hypothetical allotment reference site located at 33-21-30 / 86-05-00 easily places the 16 km allotment city grade circle over **100%** of Talladega. It should be noted that **none of the city of Munford** is close enough to the properly spaced 6 kW area to be within **any portion** of the Class A 16 km allotment circle.

C. Moving Towards Anniston Market:

Figure 2 also shows the originally licensed site of WTDR (was WEYY-FM) which was located some 10 km west of Talladega. However, in August 2000, WTDR sought and was granted a **change of site** which moved it some 12 km northeast of Talladega. In April 2003 (approximately 2 years & 4 months after building last licensed site), WTDR again sought to move and now **holds a CP** for a site which

is 4.7 km further away from its currently licensed site (CP granted September 2003). In June 2003, WTDR filed the instant rule making requesting re-allotment to Munford. However, just a few months prior (March 2003), Jacobs Broadcast Group filed six separate **FM translator applications** which all propose service in the Anniston market. It is clear from the official record that over the past 3 years WTDR has consistently been trying to establish a **stronger presence** in the Anniston market.

D. Properly Spaced Allotment Reference Point:

In Newnan & Peachtree City (90 FCC 2d 88 (1992)), the Commission established a policy by which a **grandfathered** short spaced facility could seek re-allotment of its facility to a new city of license. However, that proposal **did not involve any change** of technical facilities. In the case at hand, WTDR filed a change of site approximately 3 months prior to it filing the rule making requesting the re-allotment. That application was granted some 4 months subsequent to filing the *rule making petition*. Since the CP is still active the staff must assume that WTDR has every intention of implementing this or some other change of site and that such an intension is contrary to the intent of this grandfathered policy. WTDR has **twice** filed applications seeking new transmitter sites since the 6 kW rules were adopted and yet **both times** it elected to utilize short spaced sites despite the existence of a properly spaced area. Thus, WTDR has voluntarily sought to remain short spaced as does an application filed under the contour protection rules (73.215). However, grants made under Section 73.215 **are not permitted** to change their city of license unless a properly spaced reference point exists.

If the staff believes that grant of the NPRM serves the public interest then it should seek to insure that its allotment policy is **not abused**. The grant of the

NPRM should be conditioned upon the requirement that **any future site** not be located any closer to Anniston than is the presently licensed site or that any future site continue to provide a city grade service to **both** Talladega & Munford.

E. Potential Service in Anniston Market:

Figure 3 is a map showing the coverages of the License, the CP and a Hypothetical facility located on the existing tower of WVOK-FM. The Hypo WVOK coverage is based upon a non-directional antenna. The WVOK site would only be short spaced to WAFN as is the existing licensed site. Because of this **short spacing** it will be necessary for WTDR to utilize a directional antenna or to convince WAFN to modify its facility to comply with the rules regarding existing overlap. However, **regardless** of what is done with regard to WAFN, the power radiated in the direction of Anniston and of Munford **can be equivalent** to the 6 kW assumed herein.

It should be noted that the CP site currently authorized for WTDR is located about **as far from** Talladega as possible while still providing a city grade 70 dBu service to the city. It has been determined that the **Delta-H** from the CP site is approximately 72 meters in the direction of Munford and thus, WTDR **does not qualify** to use alternate coverage predictions to permit a site further from Talladega (and which is closer to Anniston). The WVOK site will provide a city grade 70 dBu contour to more than 50% of the Anniston Urbanized Area while also providing the required city grade service to Munford.

III. SUMMARY:

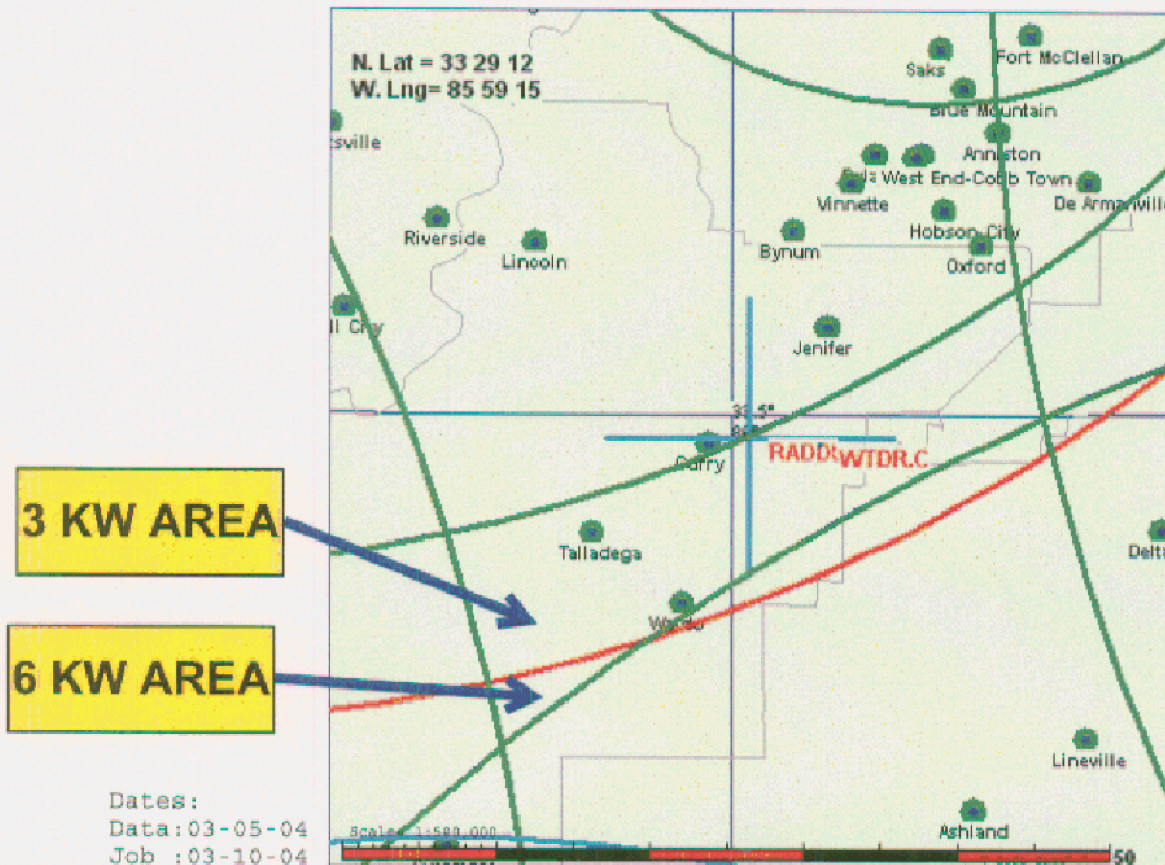
Calhoun Communication, herein **opposes the re-allotment** of Ch. 224A from Talladega to Munford, Alabama proposed in MD Docket 04-19. Use of the existing licensed site in this specific case for allotment purposes is **contrary** to past policy. Here it is possible for the applicant to propose a properly spaced reference point, however, that reference point does not provide the required city grade signal to Munford. In addition, WTDR presently holds a change of site CP which is contrary to the grandfathered allotment policy. If the staff believes a grant of this proposed re-allotment is in the public interest then they must expand the policy to permit such re-allotments where the licensee has **voluntarily proposed** to be short spaced in accordance with Section 73.215 or at a minimum condition the grant of the NPRM to avoid an abuse of this allotment policy. WTDR has move once since the 6 kW rules were adopted in 1989 and now holds a CP for another site. In neither change of site application did WTDR seek to select a properly spaced 6 kW site despite its ability to do so. It appears clear that over the past 3 years Jacobs Broadcast Group, Inc., has been **seeking ways to improve** its service into Anniston by site moves and the filing of FM translator applications. It is believed that this re-allotment is nothing more than an intermediate step which will permit WTDR to move to the outskirts of Anniston (such as the WVOK site).

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

March 29, 2004.

FMCONTTM LOCATE STUDY CH 224 A 92.7 MHz
 Jacobs
 March 2004



Dates:
 Data: 03-05-04
 Job : 03-10-04

Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
RDEL	224A	DEL	Talladega	AL	0.00	0.0	114.5	
WTDR	224A	LIC	Talladega	AL	0.00	0.0	114.5	
RADD	224A	ADD	Munford	AL	0.00	0.0	114.5	
WTDR.C	224A	CP	Talladega	AL	4.68	94.9	114.5	
WAFNFC	224A	CP	N Arab	AL	104.64	336.6	114.5	-9.86
WAFNFM	224A	LIC	Arab	AL	104.59	336.6	104.5	0.09
WIOL	224C2	LIC	Eufaula	AL	172.98	150.1	165.5	7.48
WZGC	225C1	LIC	Atlanta	GA	151.41	78.0	132.5	18.91
WTUGFM	225C1	LIC	N Tuscaloosa	AL	153.20	252.1	132.5	20.70
ALLO.R	225C1	RSV	Northport	AL	153.20	252.2	132.5	20.70
WGMZ	226A	LIC	N Glencoe	AL	53.18	12.6	30.5	22.68
WLWIFM	222C*	LIC	Montgomery	AL	121.75	189.3	94.5	27.25

(*) indicates prior rules class A spacing in effect)

New in 1990

FIGURE 1 - FM CHANNEL STUDY - 224A

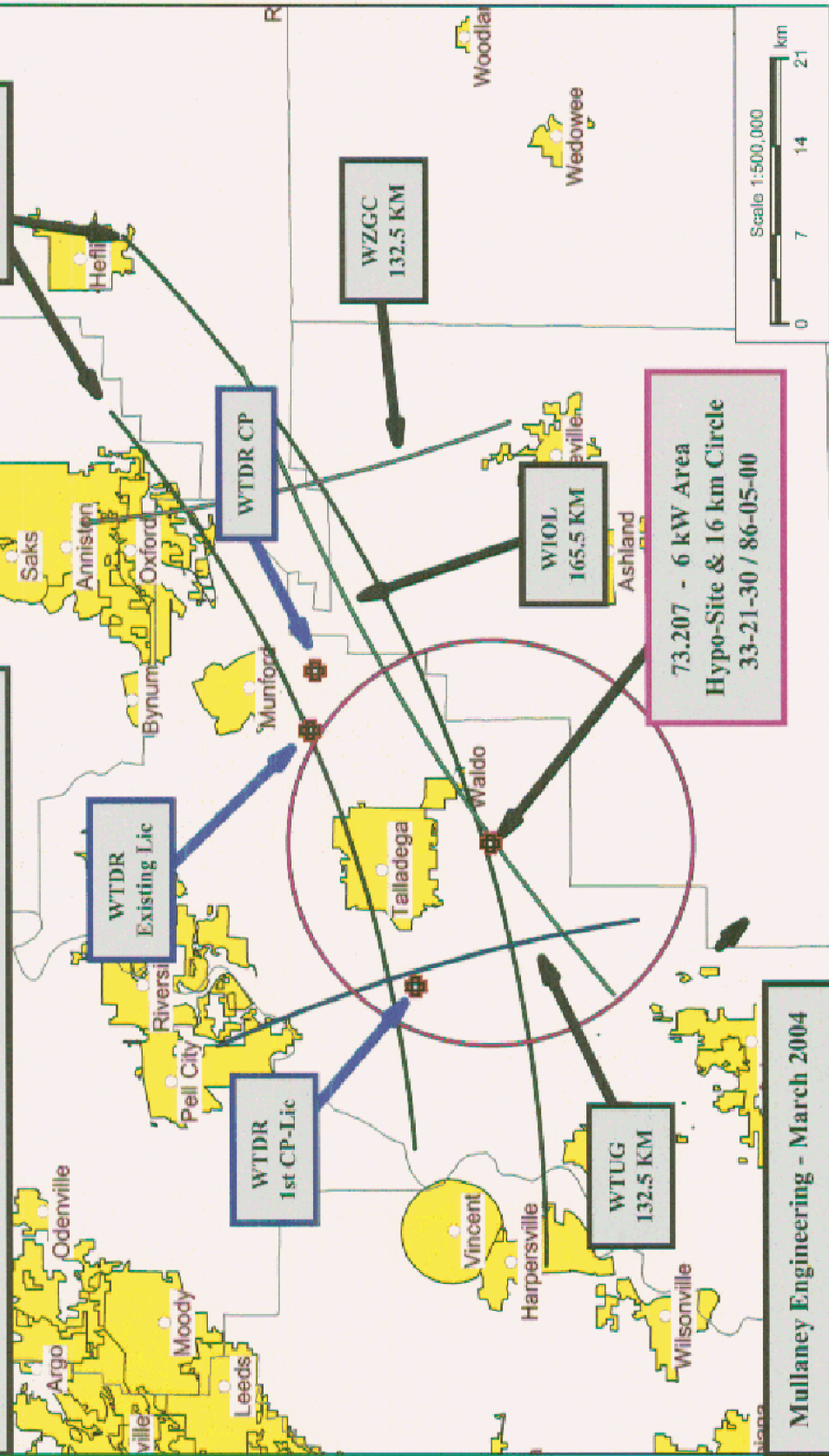
USING LICENSED SITE OF WTDR

Comments of Calhoun Communications
 MB Docket 04-19 - Talladega/Munford, AL
 Mullaney Engineering, Inc. March 2004

FIGURE 2 - ALLOWABLE AREA 224A

Comments of Calhoun Communications

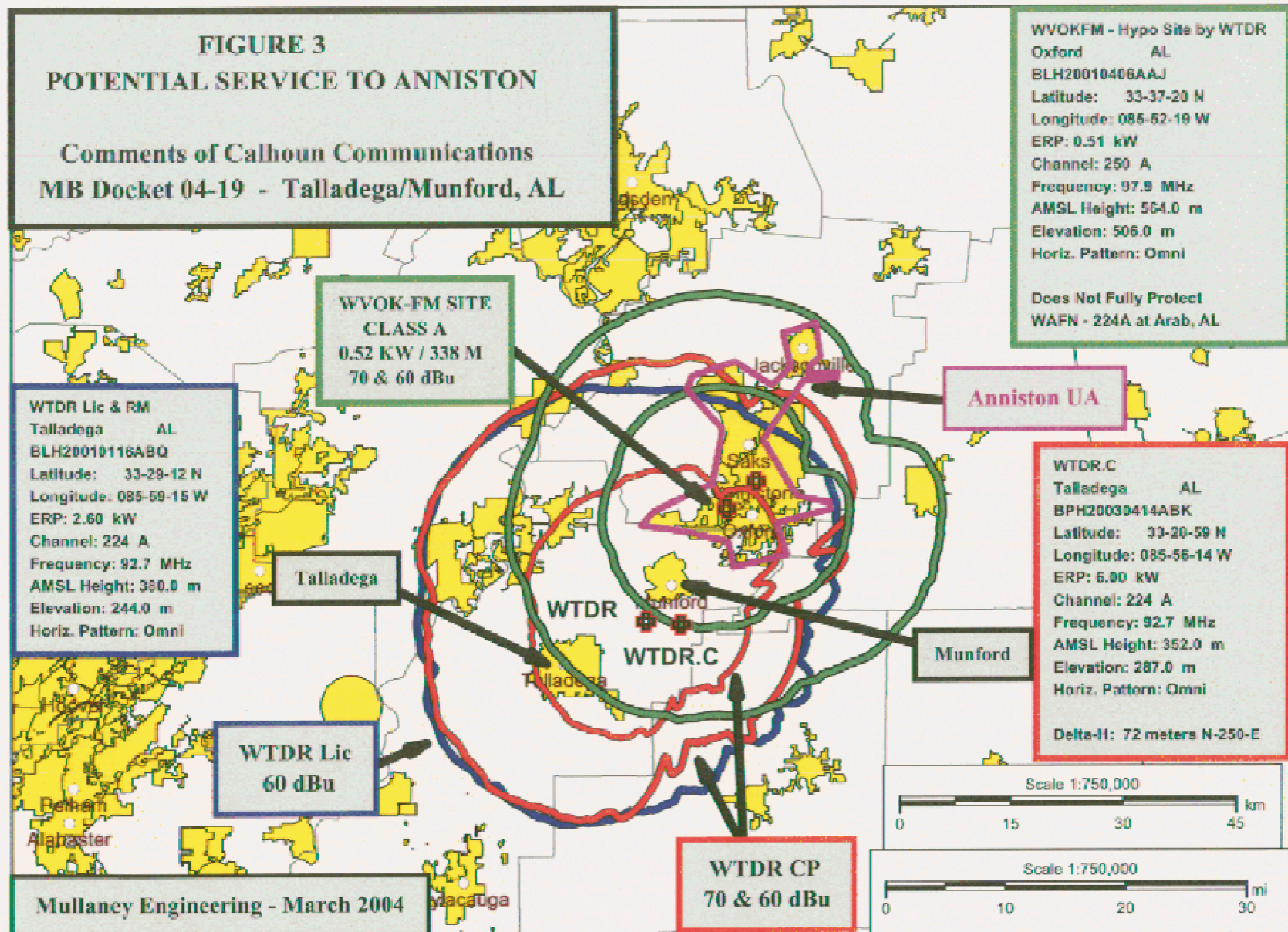
MB DOCKET 04-19 - Talledaga/Munford, AL



Mullaney Engineering - March 2004

FIGURE 3 **POTENTIAL SERVICE TO ANNISTON**

Comments of Calhoun Communications
MB Docket 04-19 - Talladega/Munford, AL



CERTIFICATE OF SERVICE

I, Evelyn Thompson, a secretary at Fletcher, Heald & Hildreth PLC, hereby certify that a true and correct copy of the foregoing "Comments" was sent on this 29th day of March, 2004, via First-Class United States mail, postage pre-paid, to the following:

Cary S. Tepper, Esquire
Booth Freret Imlay & Tepper, P.C.
7900 Wisconsin Avenue, Suite 304
Bethesda, Maryland 20814-3628


Evelyn Thompson